

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHRISTINA CORDA;)
Plaintiff,) Civil Action No. 1:15-CV-10628-RWZ
v.)
SUFFOLK COUNTY DISTRICT)
ATTORNEY'S OFFICE,)
Defendant.)

JOINT MOTION FOR PROTECTIVE ORDER

The Plaintiff, Christina Corda (“Plaintiff”) and the Defendant, the Suffolk County District Attorney’s Office (“Defendant”), hereby move that this honorable court issue a protective order relating to this matter, protecting from disclosure confidential and private information expected to be exchanged during discovery, identified in motions, and during trial. This lawsuit alleges violations of State and Federal discrimination, retaliation and equal pay laws. Discovery issued by the Plaintiff seeks confidential and private information of the Plaintiff, and former and current employees of the Defendant, some of which may be protected from disclosure pursuant to statutes of the Commonwealth of Massachusetts. For consideration of the court, the parties attach hereto as “Exhibit A” the agreed to proposed Protective Order.

WHEREFORE, the parties request that this honorable court issue the attached Protective Order.

CHRISTINA CORDA,
BY HER ATTORNEY,

SUFFOLK COUNTY DISTRICT
ATTORNEY'S OFFICE,
BY ITS ATTORNEYS,

/s/ Stephen Churchill
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DATED: 7/8/15

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CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2015, I filed the foregoing document filed through the ECF system which will send notice electronically to the registered participants as indentified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants.

/s/ Aaron R. White